Regarding the proposed 5250-5400 kHz amateur band (RM-10209), I support allocating this band to the amateur radio service on a secondary basis. From my own experience with the 3.5 and 7 mHz bands I see a need for spectrum to fill the gap in propagation conditions between these existing bands, particularly due to severe interference from international broadcasting that limits the usefulness of the 7 mHz band at night, and strong thunderstorm static that may simultaneously limit the usefulness of the 3.5 mHz band. Listening in the vicinity of 5 mHz, I have recently heard very little fixed or ship-to-shore traffic. I suspect the majority of this traffic is now communicated by satellite.

There is no justification for any special power limit in this band, different from the other h.f. bands. Operators can avoid harmful interference to primary services by following normal amateur practice. Amateurs who feel they cannot afford new high power amplifiers for this band could easily modify existing h.f. units to cover these new frequencies. This would allow these licensees a practical opportunity to upgrade their technical expertise and constructional skills beyond merely operating commercially built amateur equipment.

I propose to allow amateurs licensed General Class and higher to use any mode of emission presently authorized on the other h.f. bands, on any frequency within this new band. Amateurs can achieve any needed segregation of modes of emission by establishing a voluntary band plan, instead of calling on the Commission to expend its limited resources to enforce what is essentially an internal amateur radio matter. Most other countries in the world, including Canada, have eliminated legally sanctioned mode subbands altogether.

Respectfully submitted,

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